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Attorneys for Complainant

**BEFORE THE
PHYSICAL THERAPY BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

Case No. 1D-2005-64485

JONAH FROST
3838 Vinton Avenue, #207
Culver City, CA 90232

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

Physical Therapist No. PT 32194

Respondent.

In the interest of a prompt and speedy settlement of this matter, consistent with the public interest and the responsibility of the Physical Therapy Board of California of the Department of Consumer Affairs, the parties hereby agree to the following Stipulated Settlement and Disciplinary Order which will be submitted to the Division for approval and adoption as the final disposition of the Accusation.

PARTIES

1. Steven K. Hartzell (Complainant) is the Executive Officer of the Physical Therapy Board of California (Board). Complainant brought this action solely in his official capacity and is represented in this matter by Edmund G. Brown Jr., Attorney General of the State of California, by Adrian K. Panton, Deputy Attorney General.

2. Jonah Frost (Respondent), is represented in this proceeding by attorney Michelle Rae Hackley, Hooper, Lundy & Bookman, Inc., whose address is 180 Montgomery Street, Suite 1000, San Francisco, California 94104.

1 . 3. On or about September 19, 2005, the Board issued Physical Therapist
2 License Number PT 32194 to Respondent. The Certificate was in full force and effect at all times
3 relevant to the charges brought in Accusation No. 1D-2005-64485 and will expire on February
4 28, 2009, unless renewed.

5 **JURISDICTION**

6 4. Accusation No.1D-2005-64485 was filed before the Physical Therapy
7 Board of California, Department of Consumer Affairs, and is currently pending against
8 Respondent. The Accusation and all other statutorily required documents were properly served
9 on Respondent on January 30, 2007. Respondent timely filed his Notice of Defense contesting
10 the Accusation. A copy of Accusation No. 1D-2005-64485 is attached as Exhibit A and
11 incorporated herein by reference.

12 **ADVISEMENT AND WAIVERS**

13 5. Respondent has carefully read, fully discussed with counsel, and
14 understands the charges and allegations in Accusation No. 1D-2005-64485. Respondent has also
15 carefully read, fully discussed with counsel, and understands the effects of this Stipulated
16 Settlement and Disciplinary Order.

17 6. Respondent is fully aware of his legal rights in this matter, including the
18 right to a hearing on the charges and allegations in the Accusation; the right to be represented by
19 counsel at his own expense; the right to confront and cross-examine the witnesses against him;
20 the right to present evidence and to testify on his own behalf; the right to the issuance of
21 subpoenas to compel the attendance of witnesses and the production of documents; the right to
22 reconsideration and court review of an adverse decision; and all other rights accorded by the
23 California Administrative Procedure Act and other applicable laws.

24 7. Respondent voluntarily, knowingly, and intelligently waives and gives up
25 each and every right set forth above.

26 **CULPABILITY**

27 8. Respondent admits the truth of each and every allegation charged in
28 Accusation No. 1D-2005-64485.

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RESERVATION

9. The admissions made by Respondent herein are only for the purposes of this proceeding, or any other proceedings in which the Physical Therapy Board or other professional licensing agency is involved, and shall not be admissible in any other criminal or civil proceeding.

10. Respondent agrees that his Physical Therapist License is subject to discipline and he agrees to be bound by the Board’s imposition of discipline as set forth in the Disciplinary Order below.

CONTINGENCY

11. This stipulation shall be subject to approval by the Board. Respondent understands and agrees that counsel for Complainant and the staff of the Board may communicate directly with the Board members regarding this stipulation and settlement, without notice to or participation by Respondent or his counsel. By signing the stipulation, Respondent understands and agrees that he may not withdraw his agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

12. The parties understand and agree that facsimile copies of this Stipulated Settlement and Disciplinary Order, including facsimile signatures thereto, shall have the same force and effect as the originals.

13. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Disciplinary Order.

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DISCIPLINARY ORDER

IT IS HEREBY ORDERED that Physical Therapist License No. PT 32194 issued to Respondent Jonah Frost is disciplined by a Public Reproval. The Public Reproval shall be issued under the following terms and conditions:

1. COST RECOVERY Respondent is ordered to reimburse the Board the actual and reasonable investigative and prosecutorial costs incurred by the Board in the amount of \$ 1,383.00. Payment shall be made within thirty (30) days of the effective date of this Decision. Failure to pay the ordered reimbursement will constitute a violation of the terms of the Stipulated Settlement and Disciplinary Order. The filing of bankruptcy shall not relieve Respondent of his responsibility to reimburse the Board. If Respondent is in default of his responsibility to reimburse the Board, the Board shall collect cost recovery from the Franchise Tax Board, the Internal Revenue Service or by any other means of attachment of earned wages legally available to the Board. Failure to fulfill the obligation could also result in attachment to Department of Motor Vehicle registrations and or license renewals.

2. PUBLIC REPROVAL If Respondent makes timely reimbursement of cost recovery as set forth in paragraph one (1) of the Disciplinary Order, the Board shall issue a Public Reproval under the provisions of Business and Professions Code section 495 as the final disposition of Accusation No.1D-2005-64485 filed against Respondent. The failure of Respondent to timely comply with paragraph one (1) of the Disciplinary Order relating to cost recovery, shall constitute a violation of this stipulation and the matter will be returned to the Office of Administrative Hearings for further proceedings on the Accusation.

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ACCEPTANCE

I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully discussed it with my attorney, Michelle Rae Hackley. I understand the stipulation and the effect it will have on my Physical Therapist License. I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Physical Therapy Board of California.

DATED: March 6, 2007.

Original Signed By: _____
JONAH FROST
Respondent

I have read and fully discussed with Respondent Jonah Frost, the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve its form and content.

DATED: March 13, 2007.

Original Signed By: _____
MICHELLE RAE HACKLEY
Attorney for Respondent

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ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Physical Therapy Board of California of the Department of Consumer Affairs.

DATED: March 14, 2007.

EDMUND G. BROWN JR., Attorney General
of the State of California

Original Signed By: _____
ADRIAN K. PANTON
Deputy Attorney General

Attorneys for Complainant

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**BEFORE THE
DIVISION OF MEDICAL QUALITY
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

SEYMOUR MARTIN STOLL, M.D.
20034-B Hawthorne Blvd.,
Torrance, CA 90503

Physician's & Surgeon's Certificate No. A 35055

Respondent.

Case No. 17-2004-157711

OAH No. L2006090297

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Division of Medical Quality, Medical Board of California, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on May 25, 2007.

It is so ORDERED April 25, 2007.

Original Signed By: Nancy Krueger, President
PHYSICAL THERAPY BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS